

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

FORD MOTOR COMPANY, A Delaware
Corporation; SEVERSTAL NORTH AMERICA,
INC., a Delaware Corporation,

Plaintiffs,

v.

Case No. 2:08-cv-13503-RHC-MKM
Hon. Robert H. Cleland

MICHIGAN CONSOLIDATED GAS COMPANY,
a Michigan Corporation,

Defendant.

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SEVERSTAL NORTH AMERICA, INC.'S WITNESS LIST

Severstal Dearborn, Inc. (formerly known as Severstal North America, Inc.) ("Severstal"), by and through its attorneys Driggers, Schultz & Herbst, P.C., and Eckert Seamans Cherin & Mellott, LLC, hereby submits the following list of witnesses who will or may be called in the trial of this matter.

1. James Earl, Environmental Manager, Severstal, can be reached through counsel for Severstal. It is expected that he will be able to testify to Severstal's activities and operations at the SRA Property.

2. Lan Trinh, Environmental Engineer, Severstal, can be reached through counsel for Severstal. It is expected that she will be able to testify to Severstal's activities and operations at the SRA Property.

3. Donald Windeler, former Environmental Manager, Severstal, can be reached through counsel for Severstal. It is expected that he will be able to testify to Severstal's activities and operations at the SRA Property.

4. Tim Chen, former Environmental Engineer, Severstal, can be reached through counsel for Severstal. It is expected that he will be able to testify to Severstal's activities and operations at the SRA Property.

5. Dennis Crosby, former Vice-President of Engineering, Rouge Steel Company, can be reached through counsel for Severstal. He will be able to speak to handling of environmental issues.

6. George Waggoner, former Environmental Engineer, Rouge Steel Company, can be reached through counsel for Severstal. He will be able to speak to handling of environmental issues.

7. Larry Keeney, former Environmental Manager, Rouge Steel Company, can be reached through counsel for Severstal. He will be able to speak to handling of environmental issues.

8. Lowell Potvin, former Environmental Engineer, Rouge Steel Company, can be reached through counsel for Severstal. He will be able to speak to handling of environmental issues.

9. Jerome S. Amber, can be reached through counsel for Ford. He will be able to speak to Ford's former activities and operations at the Schaefer Road Area Property (as defined in paragraph 18 of the First Amended Complaint, hereinafter "SRA Property").

10. William Dotterer, can be reached through counsel for Ford. He will be able to speak to Ford's former activities and operations at the SRA Property.

11. William A. Gaines, can be reached through counsel for Ford. He will be able to speak to Ford's former activities and operations at the SRA Property.

12. David S. Miller, can be reached through counsel for Ford. He will be able to speak to Ford's former activities and operations at the SRA Property, damages Ford has incurred, and the determination and implementation of appropriate removal and/or remedial actions at the SRA Property.

13. John P. Miltz, can be reached through counsel for Ford. He will be able to speak to Ford's former activities and operations at the SRA Property.

14. David A. O'Connor, can be reached through counsel for Ford. He will be able to speak to Ford's former activities and operations at the SRA Property.

15. H. John Phelps III, can be reached through counsel for Ford. He will be able to speak to Ford's former activities and operations at the SRA Property.

16. Tad Waskiewicz, can be reached through counsel for Ford. He will be able to speak to Ford's former activities and operations at the SRA Property.

17. Gordon Hotchkiss, Conestoga-Rovers & Associates, can be reached through counsel for Ford. He will be able to speak to technical data gathered with respect to the SRA Property.

18. Alan Van Norman, Conestoga-Rovers & Associates, can be reached through counsel for Ford. He will be able to speak to technical data gathered with respect to the SRA Property.

19. Brandon Hurl, Conestoga-Rovers & Associates, can be reached through counsel for Ford. He will be able to speak to technical data gathered with respect to property adjacent to the SRA Property.

20. Past and/or present agents, representatives and employees of Severstal, as yet unknown, who will be able to testify to Severstal's activities and operations.

21. Past agents, representatives and employees of Rouge Steel Company, as yet unknown, who will be able to testify to Rouge Steel's activities and operations.

22. Thomas F. Maguire, P.G., LSP, LEP, Forensic Environmental Services. Inc., can be reached through counsel for Ford. Mr. Maguire will provide expert testimony in the field of hydrogeology related to Ford and Severstal's claims against MichCon.

23. Allen D. Uhler, Ph.D., NewFields Environmental Forensics Practice, LLC, can be reached through counsel for Ford. Dr. Uhler will provide expert testimony in the field of environmental chemistry related to Ford and Severstal's claims against MichCon.

24. Robert M. Zoch, Jr., P.E., Zoch Consultants, can be reached through counsel for Ford. Mr. Zoch will provide expert testimony as to the overall site contamination,

remediation, and allocation of responsibility related to Ford and Severstal's claims against MichCon.

25. Other expert witnesses as yet unidentified to provide expert testimony related to Ford and Severstal's claims against MichCon, including but not limited to an expert in the field of aerial photography interpretation.

26. Meg Garakani, Ph.D., P.E, employee of DTE Energy. It is expected that she will be able to testify about the allegations contained in MichCon's Counterclaim.

27. Darrell Grassmyer, employee of DTE Energy. It is expected that he will be able to testify about the allegations contained in MichCon's Counterclaim.

28. Abed Houssari, employee of DTE Energy. It is expected that he will be able to testify about the allegations contained in MichCon's Counterclaim.

29. Robert Lee, employee of DTE Energy. It is expected that he will be able to testify about the allegations contained in MichCon's Counterclaim.

30. Diane Martino, employee of DTE Energy. It is expected that she will be able to testify about the allegations contained in MichCon's Counterclaim.

31. Past and/or present agents, representatives and employees of MichCon or DTE Energy, as yet unknown, with knowledge of MichCon's historic operations at the MGP Site (as defined in paragraph 9 of the First Amended Complaint).

32. Past and/or present agents, representatives and employees of MichCon or DTE Energy, as yet unknown, with knowledge of the environmental and/or hydrogeologic conditions at some or all portions of the MGP Site.

33. Past and/or present agents, representatives and employees of MichCon or DTE Energy, as yet unknown, with knowledge of the allegations contained in MichCon's Counterclaim.

34. Past and/or present agents, representatives and employees of Environmental Consulting & Technology, Inc., 1249 Washington, Blvd. Suite 2500, Detroit, Michigan, 48226, (313) 963-6600, who may be able to testify to the environmental and hydrogeologic conditions at some or all portions of the MGP Site.

35. Past and/or present agents, representatives and employees of EDI Engineering & Science, 611, Cascade W. Pkwy. S.E., Grand Rapids, Michigan 49506, (616) 942-0970, who may be able to testify to the environmental and hydrogeologic conditions at some or all portions of the MGP Site.

36. Past and/or present agents, representatives and employees of NOVA Consultants, Inc., 21580 Novi Road, Suite 300, Novi, Michigan, (248) 347-3512, who may be able to testify to the environmental and hydrogeologic conditions at some or all portions of the MGP Site.

37. Past and/or present agents, representatives and employees of The RETEC Group, 3900 Collins Rd.. Suite 1024, Lansing, Michigan, 48910, (517) 324-9200, who may be able to testify to the environmental and hydrogeologic conditions at some or all portions of the MGP Site.

38. Past and/or present agents, representatives and employees of SME, Inc., 43980 Plymouth Oaks Blvd., Plymouth, Michigan, 49170 (734) 454-9900, who may be able to

testify to the environmental and hydrogeologic conditions at some or all portions of the MGP Site.

39. Past and/or present agents, representatives and employees of TechLaw, Inc, 205 West Wacker Drive, Suite 1622, Chicago, Illinois, 60606, (312) 345-8990, who may be able to testify to the environmental and hydrogeologic conditions at some or all portions of the MGP Site.

40. Past and/or present agents, representatives and employees of Dames & Moore, Inc., who may be able to testify to the environmental and hydrogeologic conditions at some or all portions of the MGP Site.

41. Past and/or present agents, representatives and employees of Clayton Group Services who may be able to testify to the environmental and hydrogeologic conditions at some or all portions of the MGP Site.

42. Past and/or present agents, representatives and employees of Swanson Environmental, Inc. who may be able to testify to the environmental and hydrogeologic conditions at some or all portions of the MGP Site.

43. Past and/or present agents, representatives and employees of Weissman Contracting, Inc. who may be able to testify as to the materials it disposed or placed on the MGP Site.

44. Steve Buda, Michigan Department of Environmental Quality ("MDEQ"), Constitution Hall, 525 West Allegan Street, Lansing, MI 48909-7973. He may be able to testify to (a) the activities and actions Ford has undertaken at the SRA Property pursuant to

the Corrective Action Consent Order (“CACO”), and (b) the costs the MDEQ has incurred with respect to the SRA Property in connection with the CACO.

45. Kay Fritz, MDEQ, Constitution Hall, 525 West Allegan Street, Lansing, MI 48909-7973. She may be able to testify to (a) the activities and actions Ford has undertaken at the SRA Property pursuant to the CACO, and (b) the costs the MDEQ has incurred with respect to the SRA Property in connection with the CACO.

46. Joe Rogers, MDEQ, Constitution Hall, 525 West Allegan Street, Lansing, MI 48909-7973. He may be able to testify to (a) the activities and actions Ford has undertaken at the SRA Property pursuant to the CACO, and (b) the costs the MDEQ has incurred with respect to the SRA Property in connection with the CACO.

47. Clay Spencer, MDEQ, Constitution Hall, 525 West Allegan Street, Lansing, MI 48909-7973. He may be able to testify to (a) the activities and actions Ford has undertaken at the SRA Property pursuant to the CACO, and (b) the costs the MDEQ has incurred with respect to the SRA Property in connection with the CACO.

48. Dave Slayton, MDEQ, Constitution Hall, 525 West Allegan Street, Lansing, MI 48909-7973. He may be able to testify to (a) the activities and actions Ford has undertaken at the SRA Property pursuant to the CACO, and (b) the costs the MDEQ has incurred with respect to the SRA Property in connection with the CACO.

49. Kimberly Tyson, MDEQ, Constitution Hall, 525 West Allegan Street, Lansing, MI 48909-7973. She may be able to testify to (a) the activities and actions Ford has undertaken at the SRA Property pursuant to the CACO, and (b) the costs the MDEQ has incurred with respect to the SRA Property in connection with the CACO.

50. Past and present agents, representatives, employees and records custodians for United States Environmental Protection Agency who may be able to testify to information and documents related to current and historic uses of the MGP site and current and historic impacts to the MGP Site and the SRA Property.

51. Past and present agents, representatives, employees and records custodians for the Army Corps of Engineers who may be able to testify to information and documents related to activities conducted by the Army Corps of Engineers at the MGP site and at the SRA Property in connection with the rerouting and channelization of the Rouge River ("Rouge River Flood Control Project").

52. Past and present agents, representatives, employees and records custodians for the Wayne County Board of Road Commissioners who may be able to testify to information and documents related to the Rouge River Flood Control Project.

53. Past and present agents, representatives, employees and records custodians for other Wayne County agencies and departments, such as the Health Department, Park System, and Local Emergency Planning Commission, who may be able to testify to information and documents related to impacts found in the late 1980's on the banks of the Rouge River in the vicinity of the MGP Site.

54. Past and present agents, representatives, employees and records custodians for the City of Melvindale who may be able to testify to information and documents related to the Rouge River Flood Control Project and to the past operations of the city dump located on the SRA Property and/or MGP Site.

55. Any and all individuals and entities identified on Ford's witness list and/or any supplemental witness list(s) filed by Severstal.

56. Any and all individuals and entities identified on MichCon's witness list and/or any supplemental witness list(s) filed by MichCon.

57. Any and all persons and entities identified during the course of discovery, including those named on any document produced in discovery, identified in any interrogatory, or named in any deposition.

58. Any and all individuals necessary to authenticate, interpret, identify and/or introduce any and all exhibits.

59. All necessary rebuttal and surrebuttal witnesses.

60. All necessary impeachment witnesses.

61. To the extent they are not named individually on this witness list, all persons with whom any party has discussed the subject matter of this case.

62. Experts to be retained, if any, to counter the testimony of any experts retained by MichCon.

Ford reserves the right to amend this witness list as witnesses become known throughout the course of discovery in this matter or otherwise.

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CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2011, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the following: D. Lee Khachaturian, Tammy I. Helminski, Scott R. Dismukes, Esq., Thomas P. Wilczak, Esq., Matthew J. Lund, Esq., and Mark A. Erman, Esq.

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